

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA
Title III

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

No. 17 BK 3283-LTS

(Jointly Administered)

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA
Title III

as representative of

EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO (“ERS”),²

No. 17 BK 3566-LTS

(Joint Administration Requested)

Debtor.

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA
Title III

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY (“HTA”),³

No. 17 BK 3567-LTS

(Joint Administration Requested)

Debtor.
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¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474).

² The last four (4) digits of ERS’s federal tax identification number are 9686.

³ The last four (4) digits of HTA’s federal tax identification number are 3808.

**NOTICE OF WITHDRAWAL OF JOINT ADMINISTRATION
MOTION AND INTERIM COMPENSATION MOTION**

To the Honorable United States District Court Judge Laura Taylor Swain:

PLEASE TAKE NOTICE that the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Sales Tax Financing Corporation (“COFINA,” and together with the Commonwealth, the “Initial Debtors”) and certain other Commonwealth instrumentalities: the (i) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”); and (ii) Puerto Rico Highways and Transportation Authority (“HTA,” and together with ERS, the “Additional Debtors,” and collectively with the Initial Debtors, the “Debtors,” and each, a “Debtor”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”) filed, among others, the following documents:

- (i) *Motion for Order (a) Pursuant to PROMESA Section 304(G), Directing Joint Administration of Initial Title III Cases and Additional Title III Cases and (b) Pursuant to Section 105(a) of the Bankruptcy Code, Making Certain Orders Entered on First Day Pleadings Applicable to the Additional Title III Cases (the “Joint Administration Motion”); and*
- (ii) *Motion of Debtors Pursuant to PROMESA section 317 and Bankruptcy Code section 105(a) for Entry of Order (a) Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (b) Appointing a (i) Fee Committee, Including Approval of Proposed Composition, Structure, Governance, Operations, and Responsibilities of Such Committee, and*

(ii) *Fee Examiner to Serve As One of Its Members* (the “Interim Compensation Motion”).

PLEASE TAKE FURTHER NOTICE that the Joint Administration Motion filed at D.I. 296⁴ was refiled at D.I. 298 in Case No. 17 BK 3283-LTS in order to include the response and hearing time on the first page of the motion and, therefore, the Debtors are withdrawing D.I. 296 in Case No. 17 BK 3283-LTS.⁵

PLEASE TAKE FURTHER NOTICE that the Interim Compensation Motion filed at D.I. 300 in Case No. 17 BK 3283-LTS was inadvertently filed prior to receiving comments that will be incorporated in the motion and, therefore, the Debtors are also withdrawing D.I. 300 in Case No. 17 BK 3283-LTS without prejudice to refile the motion in the next several weeks.⁶

PLEASE TAKE FURTHER NOTICE that this notice of withdrawal is being filed pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), made applicable to these Title III cases by Bankruptcy Rule 9014(c) and PROMESA section 310.

WHEREFORE the Debtors respectfully request the Court take notice of the foregoing and allow the withdrawal of the Joint Administration Motion and the Interim Compensation Motion, without prejudice to refile the Interim Compensation Motion in the future.

Dated: June 12, 2017
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

⁴ The Joint Administration Motion was also filed in the HTA Title III case (D.I. 78) and the ERS Title III case (D.I. 60).

⁵ The Joint Administration Motion was also refiled in the HTA Title III case (D.I. 79) and the ERS Title III case (D.I. 61) in order to include the response and hearing time on the first page of the motion and, therefore, the Debtors are also withdrawing D.I. 78 in Case No. 17 BK 3567-LTS and D.I. 60 in Case No. 17 BK 3566-LTS.

⁶ The Debtors are also withdrawing the Interim Compensation Motion that was inadvertently filed in the HTA Title III case (D.I. 81) and the ERS Title III case (D.I. 63), without prejudice to refile the motion in the next several weeks.

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